

W.K., et al v. Red Roof Inns, Inc., et al

Page 289

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,  
D.P., A.F., C.A., R.K., K.P.,  
and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC.,  
et al.,

Defendants.

JANE DOE 1-4,

Plaintiffs,

v.

RED ROOF INNS, INC.,  
et al.,

Defendants.

**PL Sum. J.**

**Ex. 002**

CIVIL ACTION NO.:  
1:20-CV-05263-MHC

CIVIL ACTION NO.:  
1:21-CV-04278-WMR

Deposition of:

Taken on Behalf of the Defendant  
June 10, 2022  
Volume 2

VERITEXT LEGAL SOLUTIONS  
20 Mansell Ct., Ste. 300  
Roswell, GA 30076  
(800) 556-8974

Reported by: Terry Kozakevich, RPR, LCR

## A P P E A R A N C E S:

For the Plaintiff: TIANA S. MYKKELTVEDT, ESQ.  
MICHAEL BAUMRIND, ESQ.  
BONDURANT MIXSON & ELMORE, LLP  
One Atlanta Center  
1202 W. Peachtree St. NW, Ste 3900  
Atlanta, GA 30309  
(404) 881-4100  
mykkeltvedt@bmelaw.com

For Defendant VARAHI HOTEL, LLC:  
C. SHANE KEITH, ESQ.  
HAWKINS PARNELL & YOUNG, LLP  
303 Peachtree St. NE, Ste. 4000  
Atlanta, GA 30308  
(404) 614-7464  
skeith@hpylaw.com

For Defendants Red Roof Inns, Inc.; Red Roof  
Franchising, LLC; RRI West Management, LLC;  
RRI III, LLC; FMW RRI NC, LLC; Westmont  
Hospitality Group, Inc.; WHG SU Atlanta, LLC:  
ADI ALLUSHI, ESQ.  
PEYTON E. PATTERSON, ESQ.  
LEWIS BRISBOIS  
600 Peachtree St. NE, Ste 4700  
Atlanta, GA 30308  
(404) 348-8585  
adi.allushi@lewisbrisbois.com

Also present: Angie Poplin, Videographer

1 this?

2 MR. BAUMRIND: Okay. Thank you.

3 BY MR. ALLUSHI:

4 Q. Ms. [REDACTED] I want to go back a little  
5 bit on the North Druid Hills property. I know we  
6 discussed Smyrna yesterday, and you were asked some  
7 questions about the North Druid Hills property.

8 There was some mention yesterday that was  
9 similar to what you alleged occurred in Smyrna with  
10 the employees serving as lookouts and calling you to  
11 warn you about police and doing such things.

12 There were similar occasions at the North  
13 Druid Hills as well? Is that your testimony?

14 A. Yes.

15 Q. Okay. And you testified that you don't  
16 know who the owners of the North Druid Hills were;  
17 correct?

18 A. Correct.

19 Q. And who were the people at North Druid  
20 Hills that were serving as -- or strike that. Who  
21 were the employees at North Druid Hills that were  
22 serving as lookouts for your alleged traffickers?

23 A. It was the front desk and the...

24 Q. Housekeeping?

25 A. Housekeeping, sorry.

1 Q. Okay. So front desk agents and  
2 housekeeping?

3 A. Yes.

4 Q. Do you remember anybody in particular?

5 A. Not specifically.

6 Q. Do you remember any names?

7 A. No.

8 Q. Do you remember any descriptions of some of  
9 these employees?

10 A. I know if there was a -- I can't. I don't  
11 feel comfortable saying. I don't remember that well.

12 Q. Okay. Well, let me ask you this. How many  
13 separate employees were doing this? Was it one front  
14 desk agent and one housekeeping employee or more than  
15 that?

16 A. I don't know, because I wasn't the one that  
17 was answering the phones.

18 Q. And who was answering the phone?

19 A. My pimp.

20 Q. Okay. And all of the ones we discussed  
21 yesterday were also at North Druid Hills?

22 A. Correct.

23 Q. Does the name Michael Thomas, employee at  
24 North Druid Hills, ring a bell?

25 A. No.

1 Q. African-American, short, skinny gentleman?  
2 Does that somehow help you recall?

3 A. I was never in the front office, so I don't  
4 know what they looked like. I just know that we got  
5 calls from them.

6 Q. Okay. And how do you know -- so these  
7 employees were calling the pimps; right?

8 A. Correct.

9 Q. And they were on the phone; right?

10 A. Right.

11 Q. Was it on speakerphone?

12 A. Sometimes it was.

13 Q. Okay. So you could hear what they were  
14 saying?

15 A. Yeah.

16 Q. Could you hear what they were saying even  
17 when they weren't on the speakerphone or only when  
18 they were on speakerphone?

19 A. Only when they were on speakerphone.

20 Q. So you heard at times when they were on  
21 speakerphone these front desk agents warn the pimp  
22 that the police were coming?

23 A. I don't know if it was just the front desk,  
24 but, yes.

25 Q. Okay. Were the housekeepers also calling?

1 A. I can't remember. It was one of those two  
2 days.

3 Q. And then when you left St. Jude's, where  
4 did you go?

5 A. Back with my trafficker.

6 Q. And why is that?

7 A. I had just gotten put out of the facility.  
8 I had nowhere else to go. They were waiting for us to  
9 get out anyways. Because [REDACTED] and I -- well, I  
10 went. I don't know if she was there at the time.

11 Q. Could you not have called your mom and dad?

12 A. They wouldn't have come and gotten me.

13 Q. What about your brothers?

14 A. They wouldn't have come and gotten me.

15 Q. And why is that?

16 A. Well, at that time, I mean, my pimps  
17 controlled my mind, body, and soul. They were  
18 constantly telling me my family didn't love me, they  
19 didn't want me anymore.

20 And so I believed them, so I didn't call  
21 anymore.

22 Q. So do you need a minute?

23 A. No. I'm okay.

24 Q. So when you left St. Jude's, did you call  
25 them to pick you up, or did you just go out over?

## REPORTER'S CERTIFICATION

STATE OF TENNESSEE           )  
COUNTY OF GREENE           )

I, Terry L. Kozakevich, LCR #394, Licensed Court Reporter, Registered Professional Reporter, (and Notary Public), in and for the State of Tennessee, do hereby certify that the above deposition was reported by me and that the foregoing 382 pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number and expiration date following my name below.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 22nd day of June, 2022.



---

Terry L. Kozakevich, LCR #394  
Registered Professional Reporter  
Expiration Date 9/30/2023  
Notary Public Commission Expires 8/29/22